

Exhibit 50

Excerpts of deposition of Gregory Stevens as TST 30(b)(6)
(November 3, 2023)

In the Matter Of:
THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

1:22-cv-01343-MKV

GREGORY STEVENS

November 03, 2023

30B6



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THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

November 03, 2023

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1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 THE SATANIC TEMPLE, INC.,

5 Plaintiff,

6 -against-

Case No.

1:22-cv-01343-MKV

7 NEWSWEEK DIGITAL, LLC,

8 Defendant.

9 -----x

10 November 3, 2023
11 9:43 a.m.

12
13 30(b)(6) Deposition of Plaintiff by
14 GREGORY STEVENS, taken by Defendant, held at
15 30 Rockefeller Plaza, New York, New York,
16 before Joseph R. Danyo, a Shorthand Reporter
17 and Notary Public within and for the State
18 of New York.
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GREGORY STEVENS 30B6
THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

November 03, 2023

2

A P P E A R A N C E S :

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By: CAMERON STRACHER, ESQ.
SARA TESORIERO, ESQ. (Via Zoom)

Also Present:

LAURA HENRIQUE, ESQ., Newsweek (Via Zoom)

RACHELLE PIKE, Paralegal, Cameron Stracher PLLC
(Via Zoom)

~oOo~

1 Stevens

2 nature, you want me to give you a high level
3 summary?

4 Q. Yeah, that would be great, based on
5 your record or your recollection.

6 A. Some of this is indirect knowledge.
7 Some of it is because, although I wasn't at this
8 time on the national council or anything when it
9 first started, I know Shelby and I know other
10 members of Austin fairly well. Yeah.

11 Conversations with people who were involved as
12 well. So Kiley started making claims about
13 Shelby. If you don't mind, I will actually refer
14 back to my document because I am bad with dates.

15 Q. Sure.

16 A. Kiley started making claims about
17 Shelby, and it was actually earlier than April
18 2020 sort of informally that some of these claims
19 were being made and even shared online that seem
20 to be sort of an effort to draw other people in
21 to, you know, quote warn people and let people
22 know unquote about Shelby before even an official
23 complaint was filed.

24 Then on or about in April of 2020 was
25 when, not Kiley, but an ex of Shelby's who also

Stevens

was friends with Kiley e-mailed the national council with the allegation that Shelby had sexually assaulted Kiley. So the allegation was that Shelby sexually assaulted Kiley. The report was e-mailed in by a person who was a friend of Kiley's and an ex of Shelby's.

National council's first response was to encourage Kiley to file a police report, but she said she was not going to do that. Over the course of the following month or so, I'm trying to think of a good neutral way of phrasing this, because I don't want to sound like I'm making any accusations one way or the other, but it seemed like there was a lot of effort to reach out to people, TST members individually, to, you know, warn people, sway people, whatever language you want to use, right, about this.

Q. By who?

A. By friends of Kiley's or friends of Laura's, and it got to the point where someone, it was Laura, threatened to go public quote unquote, whatever that means, with the claim that TST was covering up these accusations, and it was at that point that Shelby stepped down.

Stevens

even there was a point when the national council advised that like, you know, the congregation if you see stuff because there was so much stuff going on online, there was so much like people talking, you know, making accusations online and all this stuff, and so there was urging messages to leadership like please don't get involved, please don't respond, please don't argue back, just please, please, and then at one point I don't know exactly when this was, but the people, you know, like Laura because of the fact that every single, every single meeting in the congregation there was a lot of just constantly turning attention to themselves and to this and, hey, did you hear that Shelby, just constant, and it made it impossible for them to have meetings, and so they ended up making the decision to remove everybody, anybody who was involved in any side of the case, right, just anybody who was currently a part of the police investigation, we just please take some time, please take some time, and they were no longer part of Austin.

So yeah. That's really, like I said, I'm speaking from the point of view of TST at the

Stevens

point where Shelby stepped down and national knew that there was police work going on, so there was no more national interest in it, because like this is being handled. Shelby is no longer a part of this, and then from the point of view of the congregation itself when eventually they said, hey, for our members' comfort and safety, anybody involved in the investigation based on their behavior, and they're being removed, this became no longer a TST thing even though there's obviously --

Q. A lot of stuff about it?

A. Stuff that happened since then.

Q. Yeah. Okay. What result, if you know, became of the police investigation of Shelby?

A. They dropped the case.

Q. And Shelby resigned you said from TST. Is that right?

A. He resigned from being in leadership and a member of the congregation. I think he still considered him himself a member of TST generally, but yeah.

Q. And what about Kiley? What happened

GREGORY STEVENS 30B6
THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

November 03, 2023
116

1 Stevens

2 to her vis-à-vis TST?

3 A. I don't know.

4 Q. So let's mark this as Exhibit 19.

5 (Defendant's Exhibit 19, Document
6 Bates stamped TST 430, was so marked for
7 identification, as of this date.)

8 Q. I just marked Exhibit 19 a document
9 Bates numbered TST 430. Do you recognize this
10 document?

11 A. I do not.

12 Q. I'll represent to you this was
13 produced by the Plaintiff in this lawsuit in
14 response to Newsweek's document request.

15 A. Okay.

16 Q. Do you see the reference in that
17 document to being banned from TST for filing a
18 report about a member of leadership in TST raping
19 them?

20 A. I see the sentence you're referring
21 to.

22 Q. Do you know whether Kiley was banned
23 from TST?

24 A. I know for a fact that Kiley was not.

25 Q. She was not banned. How do you know

Stevens

let a lot of things slide. So many stories involved leaving a lot of things to the side, but then nothing had risen to the point of Jex being a real topic of conversation until I remember, I remember the evening getting the phone call saying, hey, Jex just like literally like made a statement about encouraging people to kill the president in one of the rituals.

We need to freaking do something about this. Jex was almost a ghost prior to that. You know what I mean? Like doing things, not completely, because there were some things she did that were very antagonistic. We had chapters in Texas, and chapters tend to be very territorial isn't necessarily the right word, but they have their area, and so Jex just independently, no proposal, no communication, decided to like do a thing in Texas and got the Texas groups upset, because they felt like they were being, like why are we even here, if Jex can just without even telling us ahead of time do this ritual thing, this call for this action in our area.

So that kind of thing was the only

GREGORY STEVENS 30B6
THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

November 03, 2023
134

Stevens

A. Sure.

Q. The bottom of page 6.

A. Yeah.

Q. So on May 9th, Doug Mesner, Lucien,
right?

A. Yes.

Q. Writes a draft e-mail?

A. Hang on. Hang on. Are you talking
about page 6?

Q. Yes. Page 6?

A. I'm looking at a page 6. Where's
May 9th?

Q. No. I'm sorry. May 5th, 2019.

A. I got it. Yeah, yeah, yeah.

Q. And I'm wondering if that refreshes
your recollection about the nature of this
e-mail, the timing, what it was referring to?

A. It does. Thank you very much. So
this wasn't a direct consequence of the incident
of her having a ritual in which she told people
that they should kill the president, which is why
she was terminated. You know, it wasn't that
incident, but after the movie came out --

Q. And, by the movie, you mean the movie

GREGORY STEVENS 30B6
THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

November 03, 2023
172

Stevens

didn't get that document, and I think you testified you're not aware of where or whether that document exists, but, Matt, if you can make an effort to see if you could find that document, and I ask the deponent as well.

THE WITNESS: I see.

MR. STRACHER: Will you do that for us? Go back to the original e-mail and see if there's an attachment. Alright. That's my only question. That's it. Thank you all. Thanks very much.

(Time noted: 3:40 p.m.)

Subscribed and sworn to
before me this____day of_____, 2023.

GREGORY STEVENS 30B6
THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

November 03, 2023
173

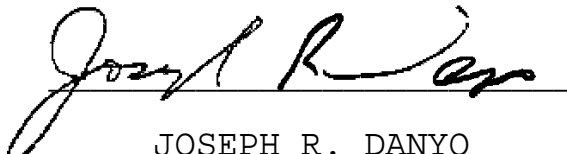
C E R T I F I C A T I O N

I, JOSEPH R. DANYO, a Shorthand Reporter
and Notary Public, within and for the State of New
York, do hereby certify:

That I reported the proceedings in the
within entitled matter, and that the within transcript
is a true record of such proceedings.

I further certify that I am not related, by
blood or marriage, to any of the parties in this
matter and that I am in no way interested in the
outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my
hand this 10th day of November, 2023.



JOSEPH R. DANYO

STATE OF NEW YORK

My Commission Expires 2/20/2027